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Filing date: **12/30/2009**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91183588
Party	Plaintiff Young & Co.'s Brewery Plc, Young & Co.'s Brewery, plc
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Submission	Motion for Sanctions
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Signature	/s/ Jason D. Jones
Date	12/30/2009
Attachments	Motion for Entry of Judgment (F0559881).PDF ( 3 pages )(830431 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

YOUNG & CO.'S BREWERY, PLC,

Opposer,

v.

SHANDONG JOYOUNG HOUSEHOLD  
ELECTRICAL APPLIANCES CO., LTD.

Applicant.

**Opposition No. 91183588**

**MOTION FOR ENTRY OF JUDGMENT**

By Order dated November 24, 2009, the Board granted Opposer's motion to compel Applicant to respond to discovery requests, and ordered Applicant "to serve upon Opposer full and complete answers to all requests for interrogatories and all requests for documents and things, without objection." The Board allowed Applicant thirty days from the mailing date of the Order to respond. Thirty days from the mailing date of the order expired on December 24, 2009. To date, we have not received any response whatsoever from Applicant concerning the discovery requests, nor have we received a request for an extension of time or any other communication from Applicant.

Accordingly, pursuant to the Board's November 24, 2009 Order, Opposer hereby moves for discovery sanctions, specifically entry of judgment sustaining the opposition under Trademark Rule of Practice 2.120(g)(1). *See Unicut Corp. v. Unicut, Inc.*, 222 U.S.P.Q. 341, 344 (T.T.A.B. 1984).

Opposer further requests that the Board suspend this proceeding with respect to all matters not germane to this motion pursuant to Trademark Rule of Practice 2.127(d).

Dated: New York, New York  
December 30, 2009

Respectfully submitted,

FROSS ZELNICK LEHRMAN  
& ZISSU, P.C.

By: 

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*Attorneys for Opposer*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of December, 2009, a true and correct copy of the foregoing **MOTION FOR ENTRY OF JUDGMENT** was served on Applicant by prepaid first class mail (and email) by sending a copy to Applicant's attorney of record in the above-captioned proceeding at the addresses indicated below:

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Jason D. Jones